

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

SHUIYING WANG,

Plaintiff,

v.

JOHN DOE and 016.com, 100700.com,
160365.com, 2020.cc, 2260.com, 365r.com,
391.com, 4440.com, 4440.net, 551.com,
5528.com, 5674.com, 5796.com, 6020.com,
6218.com, 6653.com, 739.com, 7753.com,
8194.com, 860.com, 860.net, 8817.com,
8847.com, 8894.com, 89948.com, 9085.com,
9786.com, 9975.com, blcp.com, and vip860.com,

Defendants.

Case No. _____

DEMAND FOR JURY TRIAL

DECLARATION OF SHUIYING WANG

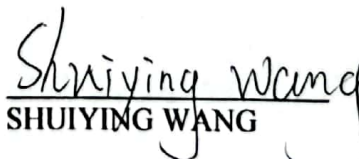
I, Shuiying WANG, declare as follows:

1. I am the Plaintiff in the above captioned case. I am over the age of eighteen and make this declaration from personal knowledge, unless otherwise indicated below.
2. I am under no legal disability, and I am competent to testify to the facts set forth below. If I were called upon to testify, I could and would testify competently as to the facts set forth herein.
3. I submit this Declaration in support of my Original Complaint.
4. I am the rightful owner of the registrant account (Customer No. 110200447, registrant email is vsv999888@gmail.com) at GoDaddy.com, and I am the registrant for the domain names 016.com, 100700.com, 160365.com, 2020.cc, 2260.com, 365r.com, 391.com, 4440.com, 4440.net, 551.com, 5528.com, 5674.com, 5796.com, 6020.com, 6218.com, 6653.com, 739.com, 7753.com, 8194.com, 860.com, 860.net, 8817.com, 8847.com, 8894.com, 89948.com, 9085.com, 9786.com, 9975.com, blcp.com, and vip860.com.

5. The Domain Names were used in commerce as early as February 2016.
6. The Domain Names have generated \$1,680 in revenue and roughly 16,800 unique visits on average each day since its first operation.
7. I owned and used the Domain Names in commerce until the Domain Names were unlawfully transferred without consent out of my GoDaddy registrant account by Defendant JD, into another registrant account with GoDaddy.com. This illegal transfer occurred sometime around November of 2021.
8. I did not learn of the hacking until March 2022, and shortly thereafter reported it to GoDaddy. However, I could not regain control of my GoDaddy account, and the issue remains unresolved.
9. The Domain Names were fraudulently transferred to another registrant account with GoDaddy.com using a privacy protected email address. I did not consent to or authorize this transfer in any way.
10. I have not regained control of my Domain Names. The same hacker who hacked into my GoDaddy account and transferred it to the current registrant account with GoDaddy still retains control of my Domain Names.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

This Declaration was executed on May 21, 2022 in China.


SHUIYING WANG